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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

INFORMATION

(Felony)

Violations:

18 U.S.C. § 2261A(2)(B), 21 U.S.C § 841(a)(1) (2 Counts)

MAR 2 2 2018

-VS-

THOMAS TRAFICANTE,

Defendant.

COUNT 1 (Cyberstalking)

The United States Attorney Charges That:

Between in or about October 2017 and in or about December 2017, in the Western District of New York, and elsewhere, the defendant, **THOMAS TRAFICANTE** with the intent to injure, harass and intimidate another person, Victim, a person known to the United States Attorney, did use an interactive computer service and facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

COUNT 2 (Distribution of Controlled Substances)

The United States Attorney Further Charges That:

In or about November 2017, in the Western District of New York, and elsewhere, the defendant, **THOMAS TRAFICANTE**, did knowingly, intentionally and unlawfully possess

with intent to distribute a mixture and substance containing cocaine, a Schedule II controlled substance and MDMA, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1)

Dated: Rochester, New York, March 2018

JAMES P. KENNEDY, JR. United States Attorney Western District of New York

BY:

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